

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

DIETZ DEVELOPMENT, LLC, et al.

Plaintiff,

v.

JANE PEREZ,

Defendant.

)
)
)
)
)
)
)
)
)

CL 2012-16249

FILED
JURY SERVICE
2012 NOV 19 PM 2:32
JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

QC

ANSWER

COMES NOW the Defendant, by counsel, and for her Answer to the Complaint states as follows:

1. Defendant admits that Dietz Development is a construction company with its principal place of business in the District of Columbia. Defendant lacks sufficient information to admit or deny the remainder of Paragraph 1, therefore, it is denied.
2. Paragraph 2 of the Complaint is admitted.
3. Paragraph 3 of the Complaint is admitted.
4. Paragraph 4 of the Complaint is admitted.
5. Paragraph 5 of the Complaint is admitted.
6. Defendant incorporates her response to Paragraphs 1-5 of the Complaint.
7. Paragraph 7 is admitted in that Dietz Development is a construction contractor, the remainder of Paragraph 7 is denied.
8. Defendant lacks sufficient information to admit or deny the allegations in Paragraph 9 of the Complaint, therefore it is denied.

9. Defendant admits that Christopher Dietz is the owner and primary point of contact for Dietz Development. Defendant lacks sufficient information to admit or deny the allegations in Paragraph 10 of the Complaint, therefore it is denied.
10. Paragraph 10 of the Complaint is admitted.
11. Paragraph 11 of the Complaint is denied.
12. Paragraph 12 of the Complaint is denied.
13. Paragraph 13 of the Complaint is denied.
14. Paragraph 14 of the Complaint is admitted.
15. Defendant admits to making the statements in Paragraphs a-e of Paragraph 15 of the Complaint, the remainder of Paragraph 15 is denied.
16. Defendant admits to making the statements in Paragraphs a-e of Paragraph 16 of the Complaint, the remainder of Paragraph 16 is denied.
17. Defendant admits to making the statements in Paragraphs a-f of Paragraph 17 of the Complaint, the remainder of Paragraph 17 is denied.
18. Defendant admits to making the statements in Paragraphs a-c of Paragraph 18 of the Complaint, the remainder of Paragraph 18 is denied.
19. Paragraph 19 of the Complaint is denied.
20. Paragraph 20 of the Complaint is denied.
21. Paragraph 21 of the Complaint is denied.
22. Defendant lacks sufficient information to admit or deny the allegations in Paragraph 22 of the Complaint, therefore, it is denied.

COUNT I – DEFAMATION

23. Defendant incorporates her response to Paragraphs 1-22.

- 24. Paragraph 24 of the Complaint is denied.
- 25. Paragraph 25 of the Complaint is admitted.
- 26. Defendant lacks sufficient information to admit or deny the allegations in Paragraph 26 of the Complaint, therefore, it is denied.
- 27. Paragraph 27 of the Complaint is denied.
- 28. Paragraph 28 of the Complaint is denied.
- 29. Paragraph 29 of the Complaint is denied.
- 30. Paragraph 30 of the Complaint is denied.
- 31. Defendant lacks sufficient information to admit or deny the allegations in Paragraph 31 of the Complaint, therefore, it is denied.
- 32. Paragraph 32 of the Complaint is denied.
- 33. Paragraph 33 of the Complaint is denied.

COUNT II – INJUNCTION

- 34. Defendant incorporates her response to Paragraphs 1-33.
- 35. Paragraph 35 of the Complaint is admitted.
- 36. Paragraph 36 of the Complaint is denied.
- 37. Defendant denies that her statements were false and defamatory, therefore Paragraph 37 of the Complaint is denied.
- 38. Paragraph 38 of the Complaint is denied.
- 39. Paragraph 39 of the Complaint is denied.
- 40. Paragraph 40 of the Complaint is denied.
- 41. Paragraph 41 of the Complaint is denied.
- 42. Paragraph 42 of the Complaint is denied.

43. Paragraph 43 of the Complaint is denied.
44. Paragraph 44 of the Complaint is denied.
45. Paragraph 45 does not require a response, to the extent that a response is required, it is denied.

FIRST AFFIRMATIVE DEFENSE

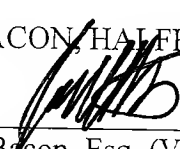
All relevant statements made by the Defendant were true

SECOND AFFIRMATIVE DEFENSE

The Complaint fails to state a cause of action for which relief can be granted.

Respectfully submitted,
JANE PEREZ
By counsel

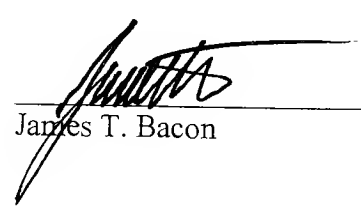
ALLRED, BACON, HALFILL, & YOUNG, P.C.

By: 
James T. Bacon, Esq. (VSB# 22146)
11350 Random Hills Road
Suite 700
Fairfax, VA 22030
703-352-1300
703-352-1301 (Fax)

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of November, 2012, a true copy of the foregoing was mailed, first-class, postage prepaid to:

Jonathan A. Nelson, Esq.
10560 Main Street
Suite 218
Fairfax, VA 22030


James T. Bacon